

EXHIBIT 1



James M. Cole
Direct: (202) 508-6091
jcole@bryancave.com

February 26, 2004

BY FEDERAL EXPRESS

The Honorable Richard Conway Casey
United States District Judge
Southern District of New York
United States Court House
500 Pearl Street
Room 1350
New York, NY 10007-1312

Re: In re Terrorist Attacks on September 11, 2001 (MDL 1570)
⁰³

Dear Judge Casey:

This Firm represents Prince Naif bin Abdulaziz al Saud, the Minister of Interior for the Kingdom of Saudi Arabia and a member of the Saudi Council of Ministers. He has been named as a defendant in four of the actions that have been consolidated before Your Honor, as well as the Federal Insurance Case.¹

To date, Prince Naif has only been served in the Federal Insurance case. We have entered into a stipulation in that case to permit the plaintiffs to amend their complaint and to put off the time for Prince Naif to respond until after the amended complaint has been filed. It is our intention to contact counsel for the plaintiffs in the four other cases and arrange for service to be accomplished.

Based on what we have seen of the complaints in all of these cases, the allegations are virtually identical. We anticipate that the amended allegations in the Federal Insurance case will be similar. As such, we submit that it would be most efficient for the Court and the parties for Prince Naif to respond to all of the complaints in one motion. Therefore, we request that the Court permit us to

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Prince Naif is named as a defendant in Burnett, et al. v. Al Baraka Investment & Development Corp., et al., District of Columbia C.A. No. 1:02-1616; Ashron, et al. v. Al Qaeda Islamic Army, et al., Southern District of New York C.A. No. 1:02-6977; Salvo, et al. v. Al Qaeda Islamic Army, et al., Southern District of New York C.A. No. 1:03-5071; York, et al. v. Al Qaeda Islamic Army, et al., Southern District of New York C.A. No. 1:03-5493; as well as Federal Insurance Co., et al. v. Al Qaida, et al., Southern District of New York C.A. No. 1:03-6978.

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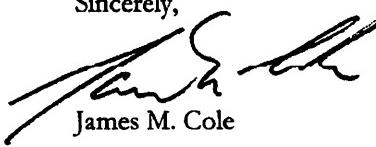
Bryan Cave LLP

consolidate the response to the five complaints into one brief.^{2/} Similarly, we propose that the plaintiffs' oppositions to that motion be combined into one consolidated brief, as the issues to which they will respond will be identical.

Finally, we propose that the briefing schedule for Prince Naif be put off until the Court has resolved the motions to be filed by Prince Sultan and Prince Turki. Based on the correspondence that was sent to Your Honor by counsel for Prince Sultan and Prince Turki, they plan to file their motions by March 5, 2004. Prince Naif's motion to dismiss will be based on many of the same grounds that are being asserted by Prince Sultan and Prince Turki. In particular, we will raise the Foreign Sovereign Immunity defense that has already been ruled on by Judge Robertson in the District of Columbia. Having the benefit of the Court's rulings on these issues would streamline our brief and expedite the motion process as to Prince Naif. Since we are, in any event, awaiting the amendment of the Federal Insurance complaint, and service has not yet been accomplished in the other cases, we submit that it would be prudent to allow the other motions on issues that will apply to Prince Naif to be resolved before we file our motion to dismiss.

We appreciate the Court's consideration of these matters. We wanted to raise them prior to the status hearing on March 1, 2004, so that the Court would have an opportunity to consider the proposals and ask any questions it may have about them at the hearing. We look forward to appearing before Your Honor on March 1, 2004.

Sincerely,



James M. Cole



cc: See Attached Service List (by facsimile or email)

Prince Naif shall file his motion to dismiss
on March 19, 2004, along with the other
defendants in this case.

^{2/} Because of the number of issues involved in these cases, we may ask the Court for an extension of the page limit to allow briefing of each of the issues raised by the complaints.



Richard Conway Casey 3/9/04

SERVICE LIST

Michael F. Baumeister Thea Capone Baumeister & Samuels, P.C. Fax: 212-363-1346	Lynne A. Bernabei Alan R. Kabat Bernabei & Katz, PLLC Fax 202-745-2627
Stephen J. Brogan Blaney Harper Michael B. Gurdack Jonathan C. Rose Jones Day Fax: 202-626-1700	Louis R. Cohen Wilmer, Cutler & Pickering Fax: 202-663-6363
Christopher R. Cooper William H. Jeffress Sara Kropf Baker Botts LLP Fax: 202-639-7890	Christopher M. Curan Nicole Erb Frank Panopoulos White & Case, LLP Fax: 202-639-9355
Michael Hadeed, Jr. Becker, Hadeed, Kellogg & Berry, P.C. Fax: 703-256-5431	Maher H. Hanania Kamal Nawash Hanania, Kheder & Nawash Fax: 703-778-2407
Matthew H. Kirkland Fulbright & Jaworski Fax: 202-662-4643	Larry Klayman Judicial Watch, Inc. Fax: 202-646-5199
James P. Kreindler Andrew J. Maloney, III Kreindler & Kreindler Fax: 212-972-9432	Mark C. Hansen Kellogg, Huber, Hansen, Todd & Evans Fax: 202-326-7999
Nancy Luque Donna M. Sheinbach Luque Sheinbach, LLP Fax: 202-238-7701	Richard T. Marooney King & Spalding, LLP Fax: 212-556-2222
Martin F. McMahon Law Offices Martin F. McMahon Fax: 202-828-4130	Thomas E. Mellon Mellon, Webster & Shelly Fax: 215 348 0171
Ronald L. Motley Jodi Flowers Motley Rice, LLC Fax: 843-216-9450	Donald J. Nolan Nolan Law Group Fax: 312-630-4011

SERVICE LISTPAGE 2

Kenneth P. Nolan Frank H. Granito, III Speiser, Krause, Nolan & Granito Fax: 212-953-6483	David J. O'Brien J.D. O'Brien Law Office Fax: 212-571-6166
Wilmer Parker Gillen, Parker & Withers, LLC Fax: 404-842-9750	Jonathan C. Reiter Law Firm of Broder & Reiter Fax: 212-268-5297
Matthew H. Simmons Roger C. Simmons Gordon & Simmons, LLP Fax: 301-698-0392	Roger E. Warin Steptoe & Johnson, LLP Fax: 202-429-3902
Henry S. Weisburg Shearman & Sterling Fax: 212-848-7179	David Jaroslawicz Jaroslawicz & Jaros Fax: 212-227-5090
Michael Barasch Fax: 212-385-7845	Don Howarth Howarth & Smith Fax: 213-622-0791
Edward H. Rubenstein Groen, Lamm, Goldberg & Rubenstein Fax: 215-638-2867	J.D. Lee David C. Lee Fax: 865-544-0536
William N. Riley Young, Riley, Dudley & DeBrotta, LLP Fax: 317-848-7831	Donald J. Winder Winder & Haslam, P.C. Fax: 801-322-2282
Richard D. Burbidge Burbidge and Mitchell Fax: 801-355-2341	Allan Gerson Fax: 202-966-8557
Harry Huge Fax: 202-624-7222	John D. Amato Russo, Scarnadella & D'Amato Fax: 718-816-8037
Jack Cordray Fax: 843-853-6330	Paul J. Hanly, Jr. Hanly & Conroy, LLP Fax: 212-401-7618
Samuel L. Davis Davis Saperstein & Salomon, PC Fax: 201-692-0444	Michael Rubenstein Rubenstein & Rynckki Fax: 718-522-3804

SERVICE LIST
PAGE 3

Michael N. Block Sullivan Papain Block Fax: 212-266-4141	Vincent F. Pitta Herrick Feinstein LLP Fax: 212-592-1500
Robert Conason Gair Gair Conason Fax: 212-425-7513	Gary O. Gailher Gailher Derobertics Nakamura Fax: 808-591-2608
Anthony M. Sellitto, Jr. Oliver & Sellitto Fax: 732-775-7404	Kenneth Sacks Sacks and Sacks LLP Fax: 212-688-8315
Clare Sproule Epstein Becker & Green Fax: 212-661-0989	George P. Blakely Notre Dame Law School Fax: 574-631-4197
Edward D. Robertson Robertson Frickelton Robertson Fax: 573-659-4460	Joseph Duffy Stetler Duffy Fax: 312-338-0070
Peter J. Kahn Williams & Connolly Fax: 202-434-5245	Elliott R. Feldman Sean P. Carter Michael J. Sommi Cozen O'Connor Fax: 215-701-2071
Ronald Liebman Mitch Berger Patton Boggs LLP Fax: 202-457-6315	